

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**[JOINT STIPULATED PROPOSED]¹
ORDER EXTENDING THE SCHEDULE**

Having reviewed Coalition Plaintiffs' Motion to Extend the Schedule and all joinders, responses, and replies related thereto; having heard argument on November 19, 2021; and being fully advised in the premises, the Court hereby ORDERS that the Amended Stipulated Order Extending Schedule (Doc. 1176) is hereby amended as follows:

Case Event	Previous Deadline (per Doc. 1176)	New Deadline
Supplementation of Plaintiffs' Expert Reports ²	Not specified	Friday, January 10, 2022

¹ Fulton County's counsel did not participate in preparing this filing, nor express objection to it.

² Defendants reserve the right to challenge Plaintiffs' supplemental and reply reports by serving a notice of objection in the event an objection is appropriate.

Case Event	Previous Deadline (per Doc. 1176)	New Deadline
Defendants' Expert Rebuttals (if any) to Plaintiffs' Supplemented Expert Reports ³	Not specified	Friday, January 24, 2022
Close of Fact Discovery	November 22, 2021 ⁴	Monday, January 31, 2022 (*)
Plaintiffs' Replies to Defendants' Expert Rebuttals	Not specified	Monday, January 31, 2022
Close of Expert Discovery (**)	December 6, 2021	Tuesday, February 15, 2022
Summary Judgment Motions (Filed)	January 5, 2022	Thursday, March 17, 2022
Summary Judgment (Response)	January 25, 2022	Thursday, April 7, 2022
Summary Judgment (Reply)	February 4, 2022	Thursday, April 14, 2022
Daubert Motions	No later than the deadline for submission of the Pretrial Order	No later than the deadline for submission of the Pretrial Order

³ Plaintiffs reserve the right to challenge Defendants' rebuttal reports by serving a notice of objection in the event an objection is appropriate.

⁴ Extended from November 15, 2021, by minute order entered on 11/10/2021 at 4:35 PM EST.

Case Event	Previous Deadline (per Doc. 1176)	New Deadline
Pretrial Order	Date of last Summary Judgment ruling + 20 days	Date of last Summary Judgment ruling + 20 days
Trial Readiness	TBD thereafter	TBD thereafter

The asterisk (*) in the above table denotes the following limitation: The fact-discovery deadline is only extended for the following purposes—(1) the completion of delayed document and data productions and the provision of responses and supplemental responses to already-served written discovery requests, (2) the noticing and completion of numerous fact-witness depositions, some of which are dependent on the prior completion of the foregoing productions and provision of written discovery responses, and (3) the resolution of discovery disputes that are either currently outstanding or that may arise upon the completion and provision of the currently pending productions and responses.

The double asterisk (**) in the above table denotes that “Expert discovery” means discovery of matters contemplated by Rule 26(a)(2) and (a)(4)—in other words, discovery of facts and data that experts considered or relied on for their opinions disclosed in their reports/declarations.

IT IS SO ORDERED this _____ day of _____, 2021.

U.S. District Court Judge Amy Totenberg

Approved as to form and respectfully submitted jointly on November 22, 2021, by:

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CERTIFICATE OF SERVICE AND COMPLIANCE

I hereby certify that on November 22, 2021, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record. In addition, pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Robert A. McGuire, III
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